

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

SCOTT D.H. REDMAN, individually and on)	
behalf of all others similarly situated,)	
)	
Plaintiff,)	No. 13 C 3810
)	
v.)	Judge Ellis
)	
CITY OF CHICAGO,)	Magistrate Valdez
)	
Defendant.)	

**JOINT MOTION FOR PRELIMINARY
APPROVAL OF CLASS ACTION SETTLEMENT AGREEMENT**

Plaintiff Scott D.H. Redman, on behalf of himself and a class of similarly-situated persons, and Defendant City of Chicago, by their respective undersigned counsel, and pursuant to Fed. R. Civ. P. 23(e), move this Court for preliminary approval of a proposed class action settlement. In support of this Motion, the parties respectfully state as follows:

1. The parties have reached a proposed class settlement of this lawsuit. A copy of the executed Class Action Settlement Agreement and Release is included herewith as **Exhibit 1** and expressly incorporated herein by reference.
2. Plaintiff will submit separately a brief in support of this Joint Motion.

WHEREFORE, and for purposes of settlement only, Plaintiff and Defendant request that this Court enter the Preliminary Approval Order contemplated in the Settlement Agreement (1) preliminarily approving the terms of the Settlement Agreement; (2) approving the form and manner of notice to the proposed Settlement Class as set forth in the Settlement Agreement and directing that such notice be given; (3) appointing Plaintiff as Class Representative; (4) appointing Plaintiff's counsel as Class Counsel; and (4) setting this matter for a Fairness Hearing

for consideration of the request for Final Approval of the proposed settlement and for entry of Final Judgment.

SCOTT D.H. REDMAN,
Plaintiff,

CITY OF CHICAGO,
Defendant,

By: /s/ Karl G. Leinberger
One of Plaintiff's Attorneys

By: s/ Bart T. Murphy

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CERTIFICATE OF SERVICE

I certify that I served a copy of this *Joint Motion for Preliminary Approval of Class Action Settlement Agreement* on the following electronically by using the CM/ECF system on this 20th day of May, 2015:

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